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MEMO ENDORSED

GRANTING REQUEST

SO ORDERED

s/ Robert E. Gerber 6/16/2011  
UNITED STATES BANKRUPTCY JUDGE

June 15, 2011

The Honorable Robert E. Gerber  
United States Bankruptcy Court  
One Bowling Green  
New York, New York 10004-1408

Re: *In re Motors Liquidation Company, et al.*, Ch. 11 Case No. 09-50026 (REG), ECF No.: Response of  
J. Michael Losh (the “**Response**”) to the 229th Omnibus Objection to Claims filed by Howard S.  
Sher on behalf of J. Michael Losh

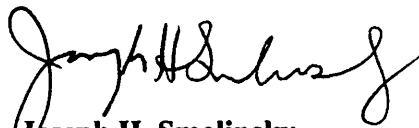
Dear Judge Gerber,

We are writing with respect to the above captioned Response, filed by counsel to the claimant, J. Michael Losh. Exhibit 1 to the Response contains a confidential retirement agreement for Mr. Losh, which provides at paragraph 13 that:

Mr. Losh understands and agrees that the existence and terms of this Agreement, together with the negotiations, discussions, and proceedings leading up to this Agreement, are confidential, and that neither Mr. Losh nor any person or entity acting on his behalf shall disclosure such matters without permission of GM, except as expressly required by law or order of a court of proper jurisdiction or disclosure to his spouse, financial advisors or legal counsel provided they agree to abide by the confidentiality terms of this Agreement.

We respectfully request that the Court order that Exhibit 1 to the Response be sealed so as to preserve the confidential nature of the document. We have obtained the consent of Mr. Losh’s counsel, Michele L. Walton of Jacob & Weingarten, P.C., to seek the Court’s permission to have the document sealed.

Respectfully submitted,



Joseph H. Smolinsky

cc: Michele L. Walton, Jacob & Weingarten, P.C.